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Attorneys for Defendants,
GREYSTONE NEVADA, LLC;
LENNAR SALES CORP.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PETER J. HELLMAN,
Plaintiff,

vs.

GREYSTONE NEVADA, LLC.;
LENNAR SALES CORP.; DOES 1
through X; and ROE CORPORATIONS
XI through XXXI, inclusive,
Defendants.

CASE NO.: 2:20-cv-00559-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

[THIRD REQUEST]

Defendants GREYSTONE NEVADA, LLC and LENNAR SALES CORP. (collectively "Defendants"), by and through their counsel of record, Amtoj S. Randhawa, Esq. of the law firm of Newmeyer & Dillion LLP, and Plaintiff PETER J. HELLMAN ("Plaintiff"), by and through his counsel of record, John B. Greene, Esq. of Vannah & Vannah, HEREBY STIPULATE pursuant to LR IA 6-1, and request the Court to extend all remaining discovery deadlines by 70 days, as set forth herein.

These extensions are requested in light of Plaintiff's recent infection with the COVID-19 virus and consequent inability to appear for his Independent Medical Examination ("IME"), currently scheduled for Tuesday, March 23, 2021.

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1 Good cause exists to grant the relief requested herein given that Plaintiff has tested
2 positive for COVID-19 and cannot appear for his currently-scheduled IME. As a result,
3 Defendants' experts are unable to evaluate Plaintiff and prepare expert reports before the
4 currently-scheduled expert disclosure deadline, and the earliest date on which the IME
5 can be rescheduled is May 25, 2020.

6 The parties have been working diligently to conduct discovery, and as of the date
7 of this stipulation, the parties have completed the following discovery:

8 (1) Plaintiff has served responses to Defendants' special interrogatories and
9 requests for production of documents;

10 (2) Defendants have served responses to Plaintiff's special interrogatories and
11 requests for production of documents;

12 (3) Defendants have completed the deposition of Plaintiff Peter Hellman;

13 (4) Defendants have completed the deposition of Lars Bangen;

14 (5) Defendants have completed the deposition of Amanda Hellman;

15 (6) Plaintiff has completed the deposition of Thomas Dome;

16 (7) Plaintiff has completed the deposition of FRCP 30(b)(6) witness for
17 Greystone Nevada, LLC;

18 (8) Plaintiff has completed the deposition of Melissa Flores; and

19 (9) Plaintiff has completed the deposition of FRCP 30(b)(6) witness for Lennar
20 Sales Corp.

21 In light of the circumstances set forth above, the parties hereby stipulate and
22 request to continue the dates set forth in the Court's Scheduling Order (ECF 15) as follows:

23 1. That the discovery cut-off be extended from **June 28, 2021 to September**
24 **6, 2021;**

25 2. That the time for parties to file any motions to amend the pleadings and/or
26 add parties to this action be extended from **March 29, 2021 to June 7, 2021;**

27 3. That the disclosure of experts and their reports shall be extended from **April**
28 **27, 2021 to July 6, 2021;**

4. The disclosure of rebuttal experts and their reports shall be extended from **May 26, 2021 to August 4, 2021;**


5. That the time for parties to file Dispositive Motions shall be extended from **July 26, 2021 to October 4, 2021;**

6. That the time for parties to prepare a Consolidated Pre-Trial Order shall be extended from **August 27, 2021 to November 5, 2021; and**

7. That the time for parties to stipulate or move to extend the discovery cutoff be extended from **June 2, 2021 to August 11, 2021.**

Dated: this 22nd day of March, 2021

NEWMAYER & DILLION LLP

By: 
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Attorneys for Defendants GREYSTONE
NEVADA, LLC; LENNAR SALES CORP.

Dated: this 22nd day of March, 2021

VANNAH & VANNAH

By: */s/ John B. Greene*
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Attorneys for Plaintiff, PETER J. HELLMAN

ORDER
IT IS SO ORDERED

DATED: 10:59 am, March 26, 2021


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE